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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE RIDDELL CONCUSSION  
REDUCTION LITIGATION

Civil Action No. 13-7585(JBS)(JS)

Motion Date: September 2, 2014  
Oral Argument Requested

**NOTICE OF MOTION TO DISMISS THE FIRST  
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

VIA ECF TO:

James E. Cecchi  
Caroline F. Barlett  
Zachary S. Bower  
CARELLA, BYRNE, CECCHI, OLSTEIN,  
BRODY & AGNELLO, P.C.  
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Dennis F. Pantazis  
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WIGGINS CHILDS PANTAZIS FISHER  
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The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203

Additional counsel for Plaintiffs

PLEASE TAKE NOTICE that on September 2, 2014, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for Defendants Riddell, Inc., All American Sports Corporation, Riddell Sports Group, Inc., Easton-Bell Sports, Inc., Easton-Bell Sports, LLC, EB Sports Corp., and RBG Holdings Corp. (collectively, "Defendants"), shall move through its attorneys Kelley Drye & Warren LLP before the Hon. Jerome B. Simandle, U.S.D.J. of the United States District Court for the District of New Jersey, Mitchell H. Cohen U.S. Courthouse and Federal Building, 400 Cooper Street, Room 1050, Camden, New Jersey 08101, for an order dismissing Plaintiffs' First Amended Consolidated Class Action Complaint, dated May 12, 2014, in its entirety pursuant to Fed. R. Civ. P. 8(a), 9(b), and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants shall rely upon their Memorandum of Law in Support of their Motion to Dismiss the First Amended Consolidated Class Action Complaint and Declaration of Michael A. Innes (with attached exhibits) submitted herewith, together with any papers Defendants may submit in reply to any opposition filed.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that if this motion is opposed, Defendants request oral argument.

Dated: August 1, 2014

Respectfully submitted,

/s/ Joseph A. Boyle  
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*Attorneys for the Defendants*

**CERTIFICATION OF SERVICE**

The undersigned certifies that the foregoing Notice of Motion to Dismiss the First Amended Consolidated Class Action Complaint, Memorandum of Law in support thereof and Declaration of Michael A. Innes, Esq. were served this 1<sup>st</sup> day of August 2014, by ECF to:

James E. Cecchi  
Caroline F. Barlett  
Zachary S. Bower  
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Additional counsel for Plaintiffs

I certify that the foregoing statement made by me is true. I am aware that if the foregoing statement made by me is willfully false, I am subject to punishment.

Dated: August 1, 2014

/s/ Joseph A. Boyle  
Joseph A. Boyle